

# Harvis & Fett

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June 12, 2017

By ECF

Honorable Cheryl L. Pollak  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Martinez v. City of New York, et al.*, 16 CV 79 (AMD) (CLP)

Your Honor:

I represent plaintiff in the above-referenced action. I write pursuant to the Court's order dated June 2, 2017, to respectfully provide a proposed deposition schedule for the Court's review and endorsement. Additionally, if it should please the Court, plaintiff respectfully requests, with defendants' consent: 1) an extension of the deadline to complete the depositions from August 14, 2017 through August 16, 2017, to accommodate the schedules of witnesses and counsel; and 2) that the status conference presently scheduled for August 16, 2017 be adjourned to a date and time convenient to the Court, so that the deposition of Lieutenant Weitzman can proceed on that date as set forth below.

The parties have conferred and agreed to the following deposition schedule:

Sgt. Laliberte	June 21, 2017
Officer Mendez	June 22, 2017
Capt. Robinson	June 27, 2017
Lt. Donovan	July 12, 2017
Sgt. Rehman	July 13, 2017
Officer Russo	August 1, 2017

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Sgt. Digennaro	August 14, 2017
Lt. Weitzman	August 16, 2017

In light of the foregoing, it is respectfully requested that the Court review and endorse the above schedule, extend the deposition deadline until August 16, 2017 and adjourn the August 16<sup>th</sup> status conference to a date and time convenient to the Court.

Thank you for your consideration of this request.

Respectfully submitted,

  
Gabriel P. Harvis

cc: ACC Paul Johnson, Esq.

*Deposition schedule is  
approved and deadline  
is extended to 8/16.  
Conference is adjourned  
to 9/13 at 1100*

*So Ordered*  
*C* /s/ Cheryl Pollak  
*06/13/17*

*6/13/17*